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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
YOUNG JOON YANG, et al.,
Defendants

No. CR 05-00395 CRB
[Filed June 23, 2005]

UNITED STATES OF AMERICA,
Plaintiff,
v.
IMSANG LEE,
a/k/a Linda,
Defendant.

No. CR 07-0735 PJH
[Filed November 20, 2007]

UNITED STATES' NOTICE OF
RELATED CASE IN A CRIMINAL
ACTION
(San Francisco Venue)

The United States hereby notifies the Court that the two above-captioned criminal cases
are related, pursuant to Criminal Local Rule 8-1.

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RELATED CASE NOTICE
[CR 05-00395 CRB, CR 07-0735 PJH]

I. DESCRIPTION OF CASES

1. United States v. Young Joon Yang et al., CR 05-00395 CRB

On June 23, 2005, a grand jury returned an indictment against 29 people in United States v. Young Joon Yang et al., CR 05-00395 CRB (hereinafter Yang Indictment). A copy of that indictment is attached as Exhibit 1. The six-count indictment includes a variety of offenses related to the employment and harboring of aliens for purposes of prostitution, including alien harboring (8 U.S.C. § 1324), money laundering (18 U.S.C. § 1956), sex trafficking (18 U.S.C. § 1591), and use of a facility in aid of unlawful activity (18 U.S.C. § 1952). The indictment was part of Operation Gilded Cage, a multi-agency investigation related to, inter alia, the operation of numerous Bay Area brothels employing illegal aliens as prostitutes.¹

2. United States v. Imsang Lee, CR 07-0735 PJH

On November 20, 2007, the United States Attorney's Office file a single-count information against Imsang Lee in United States v. Imsang Lee, CR 07-0735 PJH. A copy of that information is attached as Exhibit 2. The information charges Lee with alien harboring (8 U.S.C. § 1324) related to the operation of a Bay Area brothel, Sun Spa, and it is based on the Gilded Cage investigation. The United States has filed the information as part of an anticipated plea in this matter.

II. RELATIONSHIP OF THE CASES

Local Rule 8-1(b) defines cases as related in where "[b]oth actions appear likely to entail substantial duplication of labor if heard by different Judges or might create conflicts and unnecessary expenses if conducted before different Judges." Here, the cases are related under this provision for a number of reasons. First, both cases emanate from the same investigation, Gilded Cage, based on some of the same evidence and involving many of the same witnesses. Further, having presided over related cases encompassing over 35 defendants from Gilded Cage,

¹ Since the Yang indictment, the Court has related four other cases (U.S. v. Moore et al., CR 05-00447 CRB; U.S. v. Chang Kun Kim, CR 05-00613 CRB; U.S. v. Pang et al., CR 06-0101 VRW; and U.S. v. Lau, CR 06-192) arising from the same investigation, Operation Gilded Cage. The new case, U.S. v. Imsang Lee, CR 07- [insert], also arises from Operation Gilded Cage.

1 Judge Breyer is familiar with the facts and circumstances of that investigation. Moreover,
2 because the parties anticipate a negotiated disposition and Judge Breyer has handled all of the
3 pleas and sentencings in this matter, it would likely entail a substantial duplication of labor for
4 another judge to get up to speed in the matter and it might result in conflicts in the record. Thus,
5 the government believes that assignment of the two matters to a single judge is likely to conserve
6 judicial resources and promote the efficient administration of justice.

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8 Date: November 20, 2007

Respectfully Submitted,

9 SCOTT N. SCHOOLS

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11 /S / PETER B. AXELROD

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14 Assistant U.S. Attorneys
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